

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

IN RE: *
*
ANGELA YATES, * Case No. 08-33892-D
* Chapter 13
DEBTOR. *

MOTION TO ALLOW DEBTOR TO ENTER INTO LOAN MODIFICATION AGREEMENT

Comes now the Debtor and moves this Honorable Court to allow her to enter into a loan modification agreement with her mortgage creditor, Suntrust Mortgage, on the mortgage she has on her principal residence through Suntrust Mortgage. In support of this motion Debtor would respectfully state that Suntrust Mortgage has agreed to enter into a loan modification agreement with a new total payment of \$1773.43, which amount includes escrows, principal and interest. The new principal balance of \$310,66.88 includes all of the mortgage arrears owed by the Debtor.

PREMISES CONSIDERED, Debtor prays the Court to allow her to enter into the proposed loan modification agreement and for any and such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Melinda S. Benham (#011872)
/s/ Herbert Benham III (#011403)
Wages & Benham
2400 Poplar Avenue, Suite 410
Memphis, Tennessee 38112
(901) 323-3902

Certificate of Service

I certify that on or about February 11, 2010, I duly served a copy of this Motion, together with a copy of the Notice of Electronic filing thereof, by United States Mail or by hand delivery, upon the entities listed below, excepting those entities receiving electronic notice thereof.

/s/ Herbert Benham III

Entities Served: Debtor, Chapter 13 Trustee, All Entities on Matrix